

# **EXHIBIT D**

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**From:** McCoy, Benjamin H. <bmccoy@foxrothschild.com>  
**Sent:** Monday, February 3, 2025 7:41 AM  
**To:** Yusuf Saei; Shaeffer, John J.; Longo, Alberto; Follett, Matthew  
**Cc:** Kathleen Erskine; Marc Williams; Handforth, Jennifer  
**Subject:** RE: [EXT] Re: [Aetna v. Young] Initial Disclosures, Plan Documents

Please provide these to Jen Handforth (copied here).

For plans or any other documents you want produced you will need to serve an official discovery request and we will respond in kind.



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**Benjamin H McCoy**

Partner

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**From:** Yusuf Saei <ysaei@cohen-williams.com>  
**Sent:** Friday, January 31, 2025 4:28 PM  
**To:** McCoy, Benjamin H. <bmccoy@foxrothschild.com>; Shaeffer, John J. <jshaeffer@foxrothschild.com>; Longo, Alberto <ALongo@foxrothschild.com>; Follett, Matthew <MFollett@foxrothschild.com>  
**Cc:** Kathleen Erskine <kerskine@cohen-williams.com>; Marc Williams <mwilliams@cohen-williams.com>  
**Subject:** [EXT] Re: [Aetna v. Young] Initial Disclosures, Plan Documents

Following up to see if you received the assignments, if Aetna will provide further plan documents as requested, and if so, by when. We understand Ben's exciting family due date is imminent, so if your team just needs time let us know how much. Best,  
Yusuf

On Tue, Jan 28, 2025 at 6:23 PM Yusuf Saei <[ysaei@cohen-williams.com](mailto:ysaei@cohen-williams.com)> wrote:

Dear Ben and all,

In parallel with our initial disclosures, we are sharing additional assignment of benefit forms we have been able to gather so far for most of the enrollees in the Counterclaims.

Please send us Aetna plan documents for these individuals, including documents sufficient to ascertain the plan type (e.g. employer sponsored), the extent of MH/SUD treatment coverage at all levels of care, and corresponding reimbursement rates for out-of-contract providers (e.g. 125% of medicare). Our understanding is that the rates are typically in a plan document called evidence of coverage.

Please let me know once you are able to download the attached binder so I can deactivate the link.

 Binder of Assignments\_Redacted.pdf

Thank you,  
Yusuf

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Joseph (Yusuf) Saei  
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